

Smart Way Communications, LLC 319 East Third Street Uhrichsville, OH 44683 800,340,9093

Federal Communications Commission 445 12th St., S.W. Washington, D.C. 20554

Re: Promoting Investment in the 3550-3700 MHz Band, GN Docket No. 17-258

Smart Way Communications, LLC is a small Wireless Internet Service Provider in East Central Ohio that has been focusing on unserved and underserved locations. We have made large expansions to our network and now cover more ground than ever. For 2018 we have a plan in place that will take our services to many more unserved / underserved homes in rural areas where typical deployments are not feasible. LTE technologies are crucial for our plan, we have been investing heavily in equipment that will take advantage of the CBRS bands (3.5ghz to 3.7ghz) based on the initial rules that were laid out.

Spectrum is dangerously sparse and being a small player makes the rule changes that are contemplated in the NPRM a scary thought not only for our investment but also for the underserved / unserved populace in rural Ohio. The cellular carriers are pushing for a 10 year license term with easy renewal terms and PEA sized licenses. The initial CBRS rules (3 year term, census tract sized licenses) will allow small companies like ours to not only compete but to effectively serve rural areas that lack access to reliable internet at a fair price. We fear that if you enact the changes listed in the NPRM for CBRS the cell companies will lock down all available spectrum rights due to the high prices that will be created due to such large tracts of land.

Our planned expansion consists of more than \$800,000 in new infrastructure capable of non line of sight service with a greater standard of reliability and speed. This investment is heavily dependent on access to spectrum in the CBRS bands. With this investment we will be able to serve thousands of households that lack access to reliable and affordable internet service. The

internet today is a valuable economic tool, lacking access puts communities behind. Please think of the citizens of the East Central Ohio counties that currently lack access to affordable internet service such as: Tuscarawas, Harrison, Guernsey, Belmont, Carroll, Jefferson.

It is imperative that the CBRS stay as initially intended, where WISPS across the country are able to deploy fixed wireless internet service where fiber and copper technologies are simply not practical and the large cellular companies just won't make the investment.

Respectfully,

Ryan Grewell President Smart Way Communications, LLC